Errata sheet
for

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION

TENTATIVE ORDER NO. R9-2003-0265
NPDES PERMIT NO. CA0107867

WASTE DISCHARGE REQUIREMENTS

FOR

U.S. NAVY GRAVING DOCK

LOCATED AT

NAVAL STATION SAN DIEGO

SAN DIEGO COUNTY

The following changes are made in response to comments submitted to the Regional Board by interested persons or made to correct or clarify the tentative Order No. R9-2003-0265, tentative Monitoring and Reporting Program or Fact Sheet. The deleted text is shown as *strikethrough*; added text is shown as *underlined*.

1. Tentative Order No. R9-2003-0008

1.a. The *Table of Contents* shall be modified as noted below and page numbering and designations shall be modified as necessary.

C. Effluent Monitoring M-3
1. ~~Emergency Fire Suppression~~ Saltwater Supply Sysytem Water and Caisson Gate Ballast Water M-3
2. Graving Dock Flood Water M-4

1.b. On page 2, *Finding 3*, modify the text as noted below.

The USN Graving Dock currently diverts these discharges directly or indirectly to the San Diego Metropolitan Sanitary Sewer System (SDMSSS).

1.c. On page 3, *Finding 4*, modify the text as noted below.

4. The industrial point source discharges to San Diego Bay, as identified in the USN Graving Dock's RWD dated February 11, 2003 are:

    a. ~~Emergency fire suppression~~ Saltwater supply system water,
    b. Caisson gate ballast water, and
    c. Graving dock flood dewatering.

1.d. On page 3, *Finding 5*, modify the text as noted below.

5. Ship modification, repair, and maintenance activities are undertaken by contractors, vessel owners, operators, and crew. This Order applies to those discharges associated with ship modification, repair, and maintenance activities over which the USN Graving Dock can reasonably be expected to have control. Because the discharges of industrial storm water may contain significant quantities of pollutants, the Navy has implemented best management practices to abate the concentration of pollutants and this Order contains specifications for toxicity. Because the discharges of industrial storm water from high-risks areas may be a greater threat to water quality, this Order continues to require that the first ¼-inch of storm water from high-risk areas are prohibited unless the discharge can comply with a toxicity specification.

    This order does not apply to discharges from vessels which occur at the graving dock facility which are independent of Ship Repair Operations (i.e. cooling water). However, the Navy may be responsible for the consequences (e.g. cleanup) of discharges within and from the graving dock, including those discharges which are not subject to National Pollution Discharge Elimination System (NPDES) requirements, pursuant to 40 CFR 122.3.

1.e. On page 7, *Discharge Specifications B.1*, modify the text as noted below.

1. The effluent limitations in ***Table 1.*** *Effluent Limitations* apply to discharges of

    a. ~~Emergency fire suppression (EFS)~~ Saltwater supply system water;
    b. Graving dock flood dewatering;
    c. Graving dock caisson gate ballast water;

1.f. On page 7, *Discharge Specifications B.2*, modify the text as noted below.

2. The following acute and chronic toxicity effluent limitations apply to the discharges of ~~EFS~~ SSS and caisson gate ballast water:

1.g. On page 12, *Provisions E.9*, shall be deleted as noted below.

~~9. It shall not be a defense for the discharger in an enforcement action that effluent limitation violations are a result of analytical variability rendering the results inaccurate. The validity of the testing results, whether or not the discharger has monitored or sampled more frequently than required by this Order, shall not be a defense to an enforcement action.~~

1.h. On page 13, *Reporting Requirements F.5*, modify the text as noted below.

5. The discharger shall report any noncompliance which may endanger health or the environment orally to this Regional Board within 24 hours from the time the discharger becomes aware of the circumstances. The following occurrences must be reported to this Regional Board within 24 hours:

- Any upset which causes the effluent limitations of this Order to be exceeded; and
- Any violation of any prohibition of this Order.

The discharger shall submit to this Regional Board a written follow-up report within ~~ten~~ five days unless this Regional Board explicitly waives submittal of the written report on a case-by-case basis if the oral report has been received within 24 hours. The written report must contain the following items:

a. A description of the noncompliance and its cause;
b. The period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and
c. Steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.

2. Attachment A

2.a. The maps in *Attachment A* shall be replaced with the maps submitted by letter dated July 28, 2003.

3. Attachment B

3.a. On page B-1, section 2, modify the text as noted below.

2. Best Management Practices Program Manual

The discharger's BMPs Program shall be set forth in a written BMPs Program Manual that contains descriptions of onsite activities, pollutant sources, and pollutants; descriptions of BMPs used at the site; drawings; maps; and copies of and/or references to parts of other relevant programs. The BMPs Program Manual shall be revised whenever appropriate. It shall be readily available for review by facility employees, other onsite personnel, and the Regional Board, USEPA, ~~San Diego Unified Port District,~~ and other authorized inspectors.

3.b. On page B-2, section 3.b, modify the text as noted below.

b. Related Regulatory Requirements

The BM~~s~~Ps Program Manual shall contain or incorporate by reference the appropriate elements of programs implemented at the site in connection with other regulatory requirements. The discharger shall review all local, State, and Federal requirements that impact, complement, are related to, or are consistent with the requirements of this Order. The BMPs Program Manual shall identify any existing onsite programs that include water pollution prevention or control measures relating to the requirements of this Order.

3.c. On page B-4, section 6.a(4), modify the text as noted below.

(2) Significant Spills and Leaks

Identify and describe materials that ~~have~~ spill or leak in significant quantities in storm water discharges or non-storm water discharges upon adoptio~~o~~n of this Order. Include toxic chemicals (listed in 40 CFR 302) that have been discharged storm water as reported on U.S. Environmental Protection Agency (USEPA) Form R, and oil and hazardous substances in excess of reportable quantities (see 40 CFR 110, 117, and 302).

3.d. On page B-7, section 8.c(16), modify the text as noted below.

(16) ~~Floating dry dock,~~ ~~g~~Graving dock, ~~shipbuilding ways, and marine railway~~ cleanup

3.e. On page B-8, section 8.c(21), modify the text as noted below and renumber items accordingly.

~~(21) Recovery of ship launch grease/wax~~

3.f. On page B-11, section 9.d, modify the text as noted below.

d. An evaluation report that includes, (i) identification of personnel performing the evaluation, (ii) the date(s) of the evaluation, (iii) necessary BMPs Program revisions, (iv) schedule for implementing BMPs Program revisions, (v) any incidents of non-compliance and the corrective actions taken, and (vi) a certification that the discharger is in compliance with this Order. If the above certification cannot be provided, the evaluation report shall include an explanation of why the discharger is not in compliance with this Order. The evaluation report shall be submitted as part of the annual storm water report (see Monitoring and Reporting Program), retained for at least five years, and signed and certified in accordance with the requirements of this Order.

4. Attachment E

4.a. On page E-1, modify the text as noted below.

~~**Existing ship modification, repair, and maintenance site (existing site)** means a site where ship modification, repair, and/or maintenance facilities are located or where ship construction, modification, repair, and/or maintenance activities are conducted as of the date of adoption of this Order.~~

First flush of storm water runoff is the storm water runoff that occurs between the time a **storm event** begins and when a minimum of ~~1~~ 0.25 inch of precipitation has been collected in a rain gauge or equivalent measurement device at a location on the site which is representative of precipitation at the site. A **storm event** is a period of rainfall that is preceded by at least seven days without rainfall.

4.b. On page E-2, modify the text as noted below.

~~**High risk areas** are areas where wastes or pollutants from ship modification, repair, and maintenance activities (including abrasive blast grit material, primer, paint, paint chips, solvents, oils, fuels, sludges, detergents, cleansers, hazardous substances, toxic pollutants, non-conventional pollutants, materials of petroleum origin, or other substances of water quality significance) are subject to exposure to precipitation, run-on, and/or runoff.~~

High risk areas are areas where significant quantities of wastes or pollutants from ship modification, repair, and maintenance activities (including abrasive blast grit material, primer, paint, paint chips, solvents, oils, fuels, sludges, detergents, cleansers, hazardous substances, toxic pollutants, non-conventional pollutants, materials of petroleum origin, or other substances of water quality significance) are subject to exposure to precipitation, run-on, and/or runoff and there is a pathway by which the exposed wastes or pollutants could be discharged.

4.c. On page E-2, modify the text as noted below.

Natural light reduction may be determined by measurement of light transmissivity, total irradiance, or both, as specified by the ~~Executive Officer~~ Regional Board.

4.d. On page E-3, modify the text as noted below.

~~**New ship construction, modification, repair, and maintenance site (new site)** means a site where ship construction, modification, repair, and/or maintenance facilities are not located and where ship construction, modification, repair, and/or maintenance activities are not conducted until after the date of adoption of this Order.~~

4.e. On page E-3, modify the text as noted below.

~~**Ship construction, modification, repair, and maintenance facilities** means a site where ship construction, modification, repair, and/or maintenance facilities are located and/or where ship construction, modification, repair, and/or maintenance activities are conducted. This Order applies whether or not the discharger is in Standard Industrial Classification (SIC) category 3731 (Ship Building and Repairing).~~

5. Tentative Monitoring and Reporting Program No. R9-2003-0265

5.a. On page M-3, *Effluent Monitoring C.1*, modify the text as noted below.

C. EFFLUENT MONITORING

1. ~~Emergency Fire Suppression~~ Saltwater Supply System Water and Caisson Gate Ballast Water

   The sampling stations for each flow of water shall be located at all applicable discharge points, and where samples representative of the discharge can be obtained. Monitoring

stations shall be specified in the BMPs Plan and shall not be changed without prior review by this Regional Board.

Monitoring of the ~~emergency fire suppression~~ saltwater supply system water and caisson gate ballast water shall be conducted and submitted as specified in *Table 1. Monitoring Requirements for ~~Emergency Fire Suppression~~ Saltwater Supply System Water and Caisson Gate Ballast Water Discharges*.

Table 1. Monitoring Requirements for ~~Emergency Fire Suppression~~ Saltwater Supply System Water and Caisson Gate Ballast Water Discharges.

5.b. On page M-5, *Graving Dock Flood Water C.2*, modify the text as noted below.

If the graving dock was not flooded during the quarter, the discharger shall document in the ~~quarterly effluent monitoring report~~ Graving Dock Flooding Log that no flooding occurred during that monitoring period.

5.c. On page M-6, *Storm Water Monitoring D.3.a.ii*, modify the text as noted below.

3. Sampling and Analysis

a. The discharger shall collect storm water samples during the first hour of discharge from

i. the first storm of the wet season that produces discharges, and
ii. at least one other storm in the wet season that produces discharges ~~(even if the sample is not taken during the first hour of the discharge)~~.

5.d. On page M-7, *Storm Water Monitoring D.2, Table 2 Monitoring Requirements for Industrial Storm Water Discharges*, modify the text as noted below.

~~Chronic Toxicity[4]~~	~~TUc~~	~~Grab~~	~~1 storm per year~~

5.e. On page M-8, *Storm Water Monitoring D.4.a*, modify the text as noted below.

4. Storm Water Discharge Sampling Locations

a. The discharger shall visually observe and collect samples of storm water discharges from all drainage areas where industrial activities occur or have occurred during the previous year. The storm water discharge collected and observed shall be representative of the storm water discharge in each drainage area.

5.f. On page M-9, *Storm Water Monitoring D.5.a.iii*, modify the text as noted below and renumber accordingly.

~~i. Outside of scheduled facility operating hours; or~~

iii. When a storm event in the ~~proceeding~~ preceding seven days produced a storm water discharge.

5.g. On page M-11, *Storm Water Monitoring D.8.d*, modify the text as noted below.

d. The Annual Comprehensive Site Compliance Evaluation Report required by Attachment B, Section 9.d of Order No. R9-2003-0265;

5.h. On page M-11, *Storm Water Monitoring E.1*, modify the text as noted below.

1. Priority Pollutants: In order to comply with the Implementation Policy, the discharger shall monitor the following discharges (a representative sample may be taken for discharges with multiple discharge locations) and the receiving waters for the priority pollutants listed in *Appendix A* prior to August 1, 2004 and submit the results to this Regional Board no later than January 1, 2005:

a. ~~Emergency Fire Suppression~~ Saltwater Supply SystemWater; ~~and~~
b. Caisson Gate Ballast Water, and
c. Graving Dock Flood Water.

5.i. On page M-12, *Table 3. Monitoring and Reporting Schedule*, modify the text as noted below.

Table 3. Monitoring and Reporting Schedule.

Report Frequency/Type	**Report Period**	Report Due
Monthly Compliance Certification	Each month	By the first day of the second month after the month of sampling
Quarterly Spill and Illicit Discharge Log Graving Dock Flooding Log Graving Dock Floodwater Monitoring Report (Video Tape)	January through March	May 1
	April through June	August 1
	July through September	November 1
	October through December	February 1

Report Frequency/Type	**Report Period**	Report Due
Semi-Annually Waste Hauling Log	January through June July through December	August 1 February 1
Annually Annual Report Summary Effluent Monitoring Report Chemical Utilization Audit Sediment Monitoring Report	July 1 through June 30	~~August 1~~ September 1
Annual storm water monitoring Storm Water Monitoring Reports with Annual Comprehensive Site Compliance Evaluation Report and Certification (Attachment B requirement)	July 1 through June 30	~~August 1~~ September 1
Instances of noncompliance	per *Monitoring Provision B.9*, page M-2	As specified in *Monitoring Provision B.9*, page M-2
Appendix A Priority Pollutants	~~August 13, 2003 through~~ Prior to June 30, 2004	August 1, 2004
2,3,7,8-TCDD and congeners	~~August 13, 2003 through~~ Prior to June 30, 2005	August 1, 2004, or August 1, 2005

5.j. On page M-15, *Sediment Monitoring K.2*, modify the text as noted below.

The final Sample Collection Plan ~~and~~ shall remain unchanged from station to station and year to year.

5.k. On page M-17, *Table 5. Sediment Chemistry Methods and Detection Limits*, modify the text as noted below.

Arsenic[1]	~~7060 or 7061~~6010 or 6020	0.5 mg/kg
Lead[1]	~~7421~~6010 or 6020	0.5 mg/kg

Total Petroleum Hydrocarbons (TPH)[3]	~~Modified 8015 or DHS~~8270	500. ug/kg
Polychlorinated biphenyls/	~~8080~~8082 or GC-ECD	20.0 ug/kg

Polychlorinated terphenyls (PCBs/PCTs)[4]		

5.l. On page M-18, *Footnote 6*, modify the text as noted below.

[6] ~~Total Organic Carbon~~
~~Although not initially required, composited sediment from each sample shall be retained for possible future Total Organic Carbon (TOC) analysis. All samples shall be frozen and retained for a period of no less than 45 days from the date on which this Regional Board received the corresponding analytical results. At that time, this Regional Board shall be notified and approval to discard the samples shall be obtained, before the samples are discarded.~~

5.m. On page M-18, *MONITORING RESULTS AND REPORTS L.1* , modify the text as noted below.

L. SEDIMENT MONITORING RESULTS AND REPORTS

1. ~~Discharge~~ Sediment Monitoring Reports

~~Monitoring results must be reported on Discharge Monitoring Report forms. Discharge Monitoring Report forms~~ Sediment monitoring results must be reported in a format that will facilitate an objective evaluation of sediment conditions. The sediment monitoring reports shall be submitted to this Regional Board on a 3.5 inch DOS-formatted, double sided, high density diskette or on CD-ROM in IBM Microsoft Word 98 or older format, and in hard copy form.

Each ~~Discharge~~ Monitoring Report shall contain all required sampling results in the following three forms:

6. Fact Sheet for Tentative Order No. R9-2003-0265

6.a. The *Table of Contents* shall be modified as noted below and the sections shall be redesignated as necessary.

6.b. On page 2, modify the text as noted below.

The *point source* discharges at the USN Graving Dock are grouped into three general processes:

a. USN Graving Dock De-flooding Water;
b. Caisson Gate Ballast Water; and
c. ~~Emergency Fire Suppression~~ Saltwater Supply SystemWater.

6.c. On page 3, modify the text as noted below.

The *point source* discharges identified in the RWD are grouped into three general industrial processes: USN Graving Dock de-flooding (Outfall 001 and 002); Caisson gate ballast water (Outfall 003); and ~~Emergency Fire Suppression~~ Saltwater Supply SystemWater (Outfall 004).

6.d. On page 4, modify the text as noted below.

~~**C. Emergency Fire Suppression (EFS) Water**~~

~~The EFS system is used only on vessels that require a fire suppression system during ship repair operations. The system is activated whenever there is a loss of electrical power and/or permanent fire system failure. When EFS backup pumps are required, Bay water is supplied to the pumps for continuous priming. A relief valve discharges excess water through Outfall 004 to relive pressure on the ship's systems. As shown in *Table 2. Emergency Fire Suppression Water Discharge Analysis* the NPDES application included laboratory analyses for the Emergency Fire Suppression water discharges.~~

~~**Table 2.** Emergency Fire Suppression Water Discharge Analysis.~~

~~Analytical Parameters~~	~~2/22/02 fire water~~	~~2/23/02 fire water~~	~~5/22/00 fire pump~~
~~Flow (gallons)~~	~~2 gpm~~	~~2 gpm~~	~~NA~~
~~Oil & Grease (mg/L)~~	~~NA~~	~~NA~~	~~ND~~
~~Settleable Solids (ml/L)~~	~~NA~~	~~NA~~	~~ND~~
~~Turbidity (mg/L)~~	~~3.9~~	~~NA~~	~~1.5~~
~~pH (units)~~	~~6.7~~	~~NA~~	~~7.7~~
~~Temperature (^{o}C)~~	~~23.7~~	~~NA~~	~~20~~
~~Total Suspended Solids (mg/L)~~	~~5~~	~~NA~~	~~ND~~
~~Arsenic (mg/L)~~	~~NA~~	~~NA~~	~~ND~~

~~Analytical Parameters~~	~~2/22/02 fire water~~	~~2/23/02 fire water~~	~~5/22/00 fire pump~~
~~Cadmium (mg/L)~~	~~NA~~	~~NA~~	~~ND~~
~~Chromium (mg/L)~~	~~NA~~	~~NA~~	~~ND~~
~~Copper (mg/L)~~	~~NA~~	~~**NA**~~	~~ND~~
~~Lead (mg/L)~~	~~0.01~~	~~NA~~	~~ND~~
~~Mercury (mg/L)~~	~~NA~~	~~NA~~	~~ND~~
~~Nickel (mg/L)~~	~~NA~~	~~NA~~	~~ND~~
~~Silver (mg/L)~~	~~NA~~	~~NA~~	~~ND~~
~~Toxicity, acute (% survival)~~	~~94~~	~~97~~	~~0~~
~~Toxicity, chronic (TUc)~~	~~<1.0~~	~~0.18~~	~~>1.00~~
~~Zinc (mg/L)~~	~~0.25~~	~~ND~~	~~ND~~
~~Tributlytin (ug/L)~~	~~NA~~	~~NA~~	~~ND~~
~~PAH (ug/L)~~	~~NA~~	~~NA~~	~~ND~~
~~Total Residual Chlorine (mg/L)~~	~~ND~~	~~ND~~	~~NA~~

~~ND = not detected~~
~~NA = not applicable or not tested~~

C. Saltwater Supply System (Testing)

The Graving Dock's Saltwater Supply System has been restored to its near original design. It replaced an interim service, which supplied salt water from Pier 13 through a failing pipeline to the Graving Dock Facility. Water is now taken from the Graving Dock dewatering channel, located on the north side of the Graving Dock ship entrance, at 33 feet below Mean Low Low Water (MLLW). Salt water is delivered to ten service galleries located along the upper walls of the Graving Dock basin using three pumps; each rated at 350 GPM at 125 psi. All discharges from these pumps are diverted to the sanitary sewer system.

The Saltwater Supply System is also designed to serve as a fire protection system. This part of the system employs two fire pumps; each rated at 1,500 GPM at 150 psi. The manufacturer's product specification recommends that the two fire pumps and pressure relief valve be operationally tested for five minutes each week. Thus, 15,000 gallons per week of salt water will be discharged to San Diego Bay. All other discharges from these pumps are diverted to the sanitary sewer system.

6.e. On page 9, modify the text as noted below.

Table 5. Discharge Flow Rates for USN Graving Dock.

Discharge	**Daily flow (million gallons)**	**Annual flow (million gallons)**
USN Graving Dock de-flooding	20.20	60.60
Caisson gate ballast water	0.050	0.150
~~Emergency Fire Suppression~~ Saltwater Supply System Water	~~0.0075~~ 0.015	~~0.45~~ 0.758
Total flow =	20.2~~57~~65	61.~~20~~508

6.f. On page 11, modify the text as noted below.

For the purpose of the *Bays and Estuaries Policy* and tentative Order No. R9-2003-0265, the discharge of the following wastes will be considered innocuous nonmunicipal wastewaters and, as such, will not be considered industrial process wastes:

1. USN Graving Dock De-flooding;
2. Caisson Gate Ballast Water; and
3. ~~Emergency Fire Suppression~~ Saltwater Supply System Water.